

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Application of Vale S.A., Vale Holdings  
B.V., and Vale International S.A. for an Order  
Pursuant to 28 U.S.C. § 1782 to Conduct  
Discovery for Use in Foreign Proceedings

Case No.

***EX PARTE* APPLICATION FOR AN ORDER PURSUANT TO 28 U.S.C. § 1782 TO  
CONDUCT DISCOVERY FOR USE IN FOREIGN PROCEEDINGS**

Based upon the concurrently filed Memorandum of Law, the Declaration of Jeffrey A. Rosenthal, and other supporting documents, Vale S.A. applies to this Court for an Order, pursuant to 28 U.S.C. § 1782, and Rules 26, 34, and 45 of the Federal Rules of Civil Procedure, granting leave to serve the subpoenas attached to the Declaration of Jeffrey A. Rosenthal as Exhibits A-II.

Dated: April 24, 2020  
New York, New York

CLEARY GOTTlieb STEEN & HAMILTON LLP

/s/ Jeffrey A. Rosenthal

Jeffrey A. Rosenthal  
Lisa M. Schweitzer  
Lisa Vicens  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 225-2000

*Attorneys for Vale S.A., Vale Holdings B.V., and  
Vale International S.A.*